

**To:** Halsey, Ronald H[ronald.halsey@bp.com]  
**From:** Barton, Dana  
**Sent:** Mon 2/6/2017 5:58:00 PM  
**Subject:** RE: EPA Oversight at Leviathan

Yes, phone me at the number below. Looking forward to talking with you tomorrow.

Dana

---

Dana Barton

Acting Assistant Director

California Site Cleanup and Enforcement Branch (SFD 7)

Superfund Division

U.S. EPA, Region 9

415.972.3087

[barton.dana@epa.gov](mailto:barton.dana@epa.gov)

**From:** Halsey, Ronald H [mailto:ronald.halsey@bp.com]  
**Sent:** Monday, February 06, 2017 9:56 AM  
**To:** Barton, Dana <Barton.Dana@epa.gov>  
**Subject:** RE: EPA Oversight at Leviathan

Hi Dana,

Tomorrow afternoon works better for me. Should I call you at the number below? Thanks and look forward to talking.

ron

**From:** Barton, Dana [<mailto:Barton.Dana@epa.gov>]  
**Sent:** Monday, February 06, 2017 9:18 AM  
**To:** Halsey, Ronald H; Shaffer, Caleb  
**Subject:** RE: EPA Oversight at Leviathan

Hi Ron,

Caleb is out of the office for a couple of weeks, so I will be acting as both the Section Chief and the Assistant Director. Are you available to talk tomorrow afternoon around 4pm? Or Thursday at 10am?

Dana

---

Dana Barton

Acting Assistant Director

California Site Cleanup and Enforcement Branch (SFD 7)

Superfund Division

U.S. EPA, Region 9

415.972.3087

[barton.dana@epa.gov](mailto:barton.dana@epa.gov)

**From:** Halsey, Ronald H [<mailto:ronald.halsey@bp.com>]  
**Sent:** Sunday, February 05, 2017 10:38 AM  
**To:** Shaffer, Caleb <[Shaffer.Caleb@epa.gov](mailto:Shaffer.Caleb@epa.gov)>  
**Cc:** Barton, Dana <[Barton.Dana@epa.gov](mailto:Barton.Dana@epa.gov)>  
**Subject:** EPA Oversight at Leviathan

Caleb,

During our call before the January 17<sup>th</sup> management meeting for Leviathan and during the January 17<sup>th</sup> meeting, I mentioned that AR feels like Leviathan is being managed like a Fund lead site vs. a PRP lead site. I wanted to provide a little more context to that statement. What I meant was the level of oversight often seems to be more like what might be expected if EPA was performing the RI/FS itself using its own contractor(s), rather than acting in a review-and-approval capacity. Attached is AR's RI/FS document tracking spreadsheet that is maintained by AR's consultant AMEC Foster Wheeler (AMECFW). I've filtered the spreadsheet to show only 2015-2017 deliverables to EPA. You can remove the filter to show previous year's documents as well. As you can see, the quantity of submittals has been extensive (especially in 2016), and it far exceeds the reporting requirements in the UAO and the list of major submittals set forth in Attachment 2 to the Statement of Work. We believe often times there are excessive back and forth communications with comments, revisions, and more comments and ultimately ending only in contingent approval.

I bring this to your attention because it is the same technical team that prepares all of these documents that is also working on the Site Characterization Report, preliminary health risk screening documents and preliminary feasibility study documents. AMECFW has over 40 full time people working on the various technical documents we are preparing for this site. At times, the that number has been substantially higher. The level of EPA oversight for Leviathan is unparalleled to any other AR mining site I have been involved with, and moreover, any CERCLA site our numerous experts have worked on. I'm hopeful that our pending agreement on schedule and interim deliverables will significantly reduce this document list and multiple revisions going forward. If not, the ability to meet our pending schedule could be jeopardized.

Feel free to call me if you would like to discuss further. Thank you.

***Ron Halsey***

Operations Manager - US Mining  
Remediation Management Services Company

An Affiliate of Atlantic Richfield Company  
+1 (657) 529-4511 office  
(714) 746-4227 cell

